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RE: *FTC v. Amazon.com, Inc.*, No. 2:23-cv-0932-JHC (W.D. Wash.)
Today's Oral Argument

Judge Chun,

On Monday, we asked Defendants' counsel to authorize us to reference a small number of additional, likely non-confidential discovery materials during today's public oral argument. Defendants declined to so, citing the relatively short notice and the asserted complexity of our request. We will work with Defendants to narrow the request; however, in the event that Defendants still do not authorize us to discuss these materials publicly before today's oral argument, we have attached them (under seal) here so that the Court may review them if it chooses.

Very truly yours,


Jonathan Cohen
Counsel to Plaintiff Federal Trade Commission

Enclosure

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Tab	Bates Number	Date	Privileged and Confidential (P&C) or “Raw Notes”	Examples of Content Concerning Privileged and Confidential (P&C) Designations or Instructions to Destroy “Raw Notes”
1	Amazon-FTC-CID_07392031 (Pg. 032)	3/2/2021	P&C	
2	Amazon-FTC-CID_06991007 (Pg. 007)	5/18/2020	P&C	
3	Amazon-FTC-CID_07733633 (Pg. 636)	6/4/2020	P&C	
4	Amazon-FTC-CID_09960883 (Pg. 883)	5/8/2019	P&C	
5	AMZN-RTL-FTC-08440030 (Pg. 031)	01/21/2021	P&C	
6	Amazon-FTC-CID_07872824 (Pg. 824)	3/12/2019	P&C	
7	AMZN-RTL-FTC-14063464 (Pg. 465)	7/26/2021	“Raw Notes”	
8	AMZN-RTL-FTC-11162914 (Pg. 919)	5/13/2023	“Raw Notes”	

9	Amazon-FTC-CID_10294467 (Pg. 467)	10/17/2019	“Raw Notes”	
10	AMZN-RTL-FTC-09491766 (Pg. 768)	7/31/2023	“Raw Notes”	
11	AMZN-RTL-FTC-11481336 (Pg. 336)	2/1/2022	“Raw Notes”	

Tab	Bates Number	Date	Document Withheld in Full or in Part	Example of Content Withheld on Privilege Grounds
12	AMZN-PRM-FTC-001551540 (Pg. 540)	6/16/2017	Partially Withheld	
13	AMZN-PRM-FTC-002317819 (Pg. 823)	5/29/2022	Partially Withheld	
14	AMZN-PRM-FTC-002040948 (Pg. 948)	5/18/2018	Partially Withheld	
15	AMZN_00045678 (Pg. 001)	4/26/2021	Fully Withheld	

**TABS 1 - 15
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